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eys for Defendants

## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

TABLE MOUNTAIN RANCHERIA	Case No. C-80-cv-4595-WHO
ASSOCIATION, et al.	
	STIPULATED REQUEST FOR
Plaintiffs,	ORDER EXTENDING DEADLINES
	ON PLAINTIFFS' MOTION FOR
V.	ENFORCEMENT OF JUDGMENT
DEBRA HAALAND, et al.,	
Defendants.	

The Parties submit this stipulation in accordance with Civil Local Rule 6-2(a), and ask Court issue an order extending the deadlines for responding to Plaintiffs' Renoticed for Order to Show Cause under F.R.C.P. Rule 60(b)(6) and Enforce this Court's ent (Doc. No. 6). The Declaration of Devon Lehman McCune, counsel for the ants, is attached in support of this stipulated request.

Undersigned counsel for the Defendants received a copy of Plaintiffs' motion on ber 16, 2024, and Plaintiffs filed their Renoticed Motion on September 24, 2024. The Parties sought and received an extension of deadlines, making Defendants' response to the motion due November 14, 2024. ECF No. 9.

STIPULATED REQUEST FOR ORDER EXTENDING DEADLINES ON PLAINTIFFS' MOTION FOR ORDER TO SHOW CAUSE UNDER F.R.C.P. 60(B)(6) AND ENFORCE THIS COURT'S JUDGMENT CASE No. 3:80-CV-4595-LB

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The case was initially filed in 1980, and Plaintiffs seek to enforce a Stipulated Judgment entered in 1983. ECF No. 2-1 at 6. The civil docket for this matter is no longer available because it is a historic case and the case file was destroyed. ECF No. 2 at 3. Defendants need additional time to investigate the case and to prepare an appropriate response to the Motion. In particular, due to the age of the case, Defendants need time to locate files and research the allegations in the Motion.

Accordingly, the Parties have agreed that an adjustment of the briefing schedule is appropriate. They request that the Defendants' deadline to respond to the Renoticed Motion be extended 90 days, making it due on February 12, 2025. The Parties also request that Plaintiffs be given 45 days to file a reply brief in support of their motion, making it due on March 31, 2025. Neither party will be prejudiced by this extension.

This is the Parties' second motion for an extension of time regarding Plaintiffs' motion.

A hearing is currently set for December 4, 2024, and would need to be rescheduled.

Respectfully submitted this 6th day of November, 2024.

## TODD KIM

Assistant Attorney General Environment & Natural Resources Division

<u>s/ Devon Lehman McCune</u> DEVON LEHMAN MCCUNE

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Attorneys for Defendants

s/ John M. Peebles per authorization given on

11/5/2024

JOHN M. PEEBLES

Peebles Bergin Schulte & Robinson LLP

STIPULATED REQUEST FOR ORDER EXTENDING DEADLINES ON PLAINTIFFS' MOTION FOR ORDER TO SHOW CAUSE UNDER F.R.C.P. 60(B)(6) and Enforce This Court's Judgment Case No. 3:80-cv-4595-LB

2020 L Street, Suite 250 Sacramento, CA 95811

## **ORDER**

IT IS SO ORDERED. Defendants' response to Plaintiffs' motion shall be filed by February 12, 2025, and Plaintiffs' response shall be due March 31, 2025. The hearing currently set for December 4, 2024, shall be rescheduled to April 16, 2025 at 2:00 p.m.

Dated: November 6, 2024



STIPULATED REQUEST FOR ORDER EXTENDING DEADLINES ON PLAINTIFFS' MOTION FOR ORDER TO SHOW CAUSE UNDER F.R.C.P. 60(B)(6) AND ENFORCE THIS COURT'S JUDGMENT CASE No. 3:80-cv-4595-LB